

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
911 Call Processing Modes)	
)	WT Docket No. 99-328
Motorola Request for Approval of Modified 911)	
Call Processing Mode)	

ORDER

Adopted: February 20, 2003

Released: February 20, 2003

By the Deputy Chief, Wireless Telecommunications Bureau:

1. In this Order, we approve use of a modified call completion method for 911 calls, as requested by Motorola, Inc. (Motorola) pursuant to the requirements set out in the Commission's *Second Report and Order* in the Wireless E911 Rulemaking, Docket No. 94-102.¹

2. In the Commission's *Wireless E911 Second Report and Order*, the Commission adopted Section 22.921 of the rules. This rule helps improve 911 call completion by requiring new wireless handsets capable of operating in the analog mode to be able to complete 911 calls to either analog carrier in an area, using a 911 call completion method endorsed or approved by the Commission. The requirement took effect on February 13, 2000. In its Order, the Commission also approved three specific 911 call completion methods, including a method referred to as Automatic A/B-Intelligent Retry (A/B-IR), and delegated authority to the Wireless Telecommunications Bureau (Bureau) to consider new or revised 911 call processing methods.²

3. On September 20, 2002, Motorola filed a request for approval of a modified A/B-IR call processing method, hereinafter Automatic A/B-Intelligent Retry, Version 2 (Motorola) or A/B-IR Ver. 2 (Motorola).³ This modification would affect the way 911 calls are processed in a limited set of cases, specifically when a 911 call is terminated prematurely, without action by caller or call-taker, for example because of loss of signal. In that case, under A/B-IR, the handset would immediately attempt to complete the call using alternate channels and systems until the call is completed. Under the revised method, if the call is not terminated normally the phone would remain on the paging channel of the wireless carrier that last served the call for a period of five minutes, which Motorola contends would provide certain benefits. After five minutes, the phone would return to normal scanning for service.⁴ At any point during or after this five minute period, the caller may re-initiate a call to 911 or another number. Except for this

¹ *Revision of the Commission's Rules To Ensure Compatibility With Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, 14 FCC Rcd 10954, 10995, para. 97 (1999) (*Wireless E911 Second Report and Order*).

² *Id.* at 10995, para. 97.

³ Request of Motorola, Inc. for Approval of a Modified 911 Call Processing Mode, filed Sept. 20, 2002 (*Motorola Request for Approval*).

⁴ *Id.* at 3-4.

difference in handling of prematurely terminated calls, the handset's operation would be entirely consistent with all approved parameters of the A/B-IR method, such as providing audio and visual feedback that the 911 call set-up process is underway.⁵

4. Motorola asserts that this modification is justified as helping to route calls and transmit location information to PSAPs, to improve PSAP call-back capability, and to reduce unintentional 911 calls.⁶ Under A/B-IR, Motorola claims, if a PSAP attempts to call back the number of a "lost" call, it might receive a busy signal or be pushed into voice mail. Further, in reattempting the call, the handset might initiate the call on a different network that would not have call back number or location information associated with it, or the call might be routed to a different PSAP, impeding or confusing rescue efforts.⁷ Under the revised method, Motorola explains, while the call is held on the paging channel, the PSAP can call the "lost" caller back quickly and continue to receive location information from location-capable phones so long as the caller remains on the line. Unintentional 911 calls that were disrupted also would not be retransmitted, as they might be under A/B-IR. At the same time, the caller would be able to reinitiate a call to 911 at any time, restarting the 911 call completion process.⁸

5. Accompanying its request for approval of the revised 911 call completion method, Motorola also filed a request for expedited relief to permit continued shipment of two E911 Phase II-capable, multimode handsets incorporating this method.⁹ In an Order released on October 3, 2002, the Bureau concluded that the revised method did not appear to impair public safety and could benefit PSAPs. It therefore granted a limited, interim waiver to Motorola, subject to further review of its modified method.¹⁰ At the same time, the Bureau noted that grant of this waiver did not excuse Motorola's apparent failure to seek timely approval of its modified 911 call completion method as required by Section 22.921 and accordingly referred the matter to the Enforcement Bureau.¹¹ Subsequently, the Bureau released a Public Notice seeking comment on Motorola's revised method.¹² The only comment filed in response was from the Cellular Telecommunications and Internet Association (CTIA), which supports the request and concurs with Motorola's assessment of the benefits of the revised method in enhancing 911 call completion.¹³

6. Based on our review of this record, we conclude that Motorola's revised call completion method, A/B-IR Ver. 2 (Motorola), satisfies the Commission's standards for 911 call completion methods, and should perform the same as A/B-IR in completing most 911 calls while offering possible advantages to callers and PSAPs in the case of interrupted calls. The revised method should, for example, achieve the Commission's objectives for 911 call completion methods during call set-up in the same manner as A/B-IR, including routing calls when necessary to another wireless carrier, completing calls

⁵ *Id.* at 4-5. *See also*, Additional Information Requested Concerning Motorola's Modified Call Processing Plan, letter from Mary E. Brooner to Thomas Sugrue, Exhibit A at 4.

⁶ *Motorola Request for Approval* at 5-7.

⁷ *Id.* at 5.

⁸ *Id.* at 6.

⁹ Request for Expedited Relief for Phase II-Enabled Handsets, letter from Mary E. Brooner to Thomas Sugrue, Sept. 25, 2002 (*Motorola Request for Waiver*). The handsets are Motorola models 120E and T720. These handsets operate in both digital CDMA and analog modes.

¹⁰ *911 Call Processing Modes*, WT Docket No. 99-328, DA 02-2515 (2002) (*Interim Order*).

¹¹ *Id.* at para. 6.

¹² Public Notice, "Wireless Telecommunications Bureau Seeks Comment on Modified 911 Call Processing Method Proposed by Motorola," DA 02-2762, released October 22, 2002.

¹³ Comments of the Cellular Telecommunications and Internet Association at 1.

where possible via the preferred carrier, and addressing the potential problem that a call could be “locked-in” to the subscriber’s preferred carrier.¹⁴ In addition, it is reasonable to expect, as Motorola and CTIA contend, that A/B-IR Ver. 2 (Motorola) will help improve delivery of location information for calls that are interrupted and provide PSAP dispatchers with more control over interrupted calls during the five minute period the call is held, facilitating callback and the identification of unintentional 911 calls. We therefore conclude that the proposed method warrants approval under the *Wireless 911 Second Report and Order*. This approval is limited to the specific method proposed by Motorola, which changes only the treatment of calls that are terminated prematurely without action by the caller or the call-taker. With respect to all other aspects of 911 call completion, the handset is required to implement A/B-IR as previously approved.

7. Accordingly, IT IS ORDERED, that the Request by Motorola for Approval of Its Modified 911 Call Completion Method IS GRANTED as indicated herein.

James D. Schlichting

Deputy Chief, Wireless Telecommunications Bureau

¹⁴ See *Wireless E911 Second Report and Order*, 14 FCC Rcd at 10966.